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Attorney for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-md-02843-VC

**DECLARATION OF TIMOTHY W. LOOSE
IN SUPPORT OF DEFENDANT'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

[Civil L.R. 3-12, 7-11]

Judge Vince Chhabria
Courtroom 5, 17th Floor

CASE NO. 3:23-cv-04128-PHK

PROPOSED CASE TO BE RELATED

Assigned to: Magistrate Judge Peter H. Kang
Courtroom F, 15th Floor

I, Timothy W. Loose, declare and state as follows:

1. I am an attorney duly licensed to practice law before all of the courts of California and before this Court. I am a partner with the law firm of Gibson, Dunn & Crutcher LLP, and I am one of the attorneys responsible for representing Defendant Meta Platforms, Inc. in the proposed related case, *Rose v. Facebook*, No. 3:23-cv-04128-PHK. I make this declaration in support of Defendant's Unopposed Administrative Motion to Consider Whether Cases Should Be Related. I am personally familiar with the matters set forth herein and, if called to testify, I could and would competently testify thereto.

2. Pursuant to Civil Local Rules 3-12(b) and 7-11(a), on November 16, 2023, I contacted Plaintiff Laura Rose, who is representing herself in the *Rose* action, via e-mail and by phone to inquire whether Plaintiff would oppose relating *Rose* to *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, No. 3:18-md-02843-VC (the "MDL").

3. On November 20, 2023, I conferred with Ms. Rose by phone, and she stated that she opposes relating her action to the MDL.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 21, 2023, in Los Angeles, California.

Dated: November 21, 2023

GIBSON, DUNN & CRUTCHER, LLP

By: /s/ Timothy W. Loose

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